

EXHIBIT “A”

From: [Michael Mule](#)
To: [Gibbs, J. Evan](#); [Kent, Paris L.](#); [Adler, Matt](#); [Gorman, Daniel E.](#); [Mulry, Kevin P.](#)
Cc: [James Orioli](#); [Colleen O'Neil](#); [Joseph Labuda](#); [Robert Milman](#); [Hope Devito](#); [Kadeem Harper](#); [Michael Mule](#)
Subject: SiteOne Landscape v. Giordano, et al.; Defendant's Rolling Production #3 RE: Order 10/15/24
Date: Tuesday, November 19, 2024 2:07:51 PM
Attachments: Final_Defendants_000194 - Defendants_000371.pdf
Defendants Entities.pdf
IT Vendor for Defendants.pdf
Importance: High

Evan,

Attached please find the first tranche of Defendants' rolling production #3 in response to the Order issued by Judge Locke dated 10/15/24 (the "Order"). The documents provided in this transmission satisfy the following items of the Order:

#3 - Amount of business Scapes does

#4 - Nick's bank account records for the period January 1, 2023 to May 31, 2023 (the Court Order erroneously states "2024" but you clearly sought 2023) relating to transactions with defendants.

#5 - List of entities Don, Vic and Nick have had an interest.

#6 - Scapes related documents

#7 - Formation documents for Vic's entities

#8 - Defendants' IT vendors

We intend to provide, by November 26, documents that satisfy the following items:

#2 - Defendants communications to SiteOne employees about leaving SiteOne and coming to Scapes. Defendants' solicitations (if any) for the period of April and May 2023.

#1 (partially satisfied) - electronic searches of documents and emails consistent with the search terms and call logs.

We have been making diligent efforts. We will continue our efforts to provide the text message communications between the Defendants (item #1(b)) by the November 26 deadline. However, since this calls for a manual review, it is, obviously, a laborious task. In addition, some personnel who were previously on this matter are no longer with the firm, and some will not be available starting early next week due to travel for the upcoming Thanksgiving Holiday. Accordingly, we will be seeking a three-week extension, e.g., for the text message production, to December 17, 2024. Please advise if you will consent to this request, so that we may advise the Court. Thank you.

Sincerely,

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